IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Application of:	)	
	)	
Inventors: Andrew Ferlitsch	)	
	)	
Serial No.: 10/731,400	) ATTORNEY FILE NO.	
	) SLA1350	
Filed: December 9, 2003	)	
	) Art Unit: 2625	
Title: PRINT SUBSYSTEM	) Examiner: McLean, Neil R.	
DESPOOLING BACKPLANE	) Confirmation No.: 4524	
	) Customer: 55,286	
	)	

Board of Patent Appeals and Interferences
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY APPEAL

This paper is responsive to an Examiner's Answer mailed on February 13, 2009, regarding the rejection claims 1-2, 4, 6-9, 11-17, 19, 21-24, and 26-30 of the above-referenced application by Examiner Neil McLean, Group Art Unit 2625.

REMARKS

The claimed invention includes limitations that are not disclosed in the prior art references. The claimed invention converts a print job into an IR document and stores the IR document in a shared memory that can be accessed by a plurality of plugins. As a result, the IR document can be parallel processed by the plurality of plugins, before conversion back into a print job language.

As acknowledged in the Examiner's Answer, Kawamoto does not disclose a plurality of backplane plugins, the storing of an IR document in a shared memory, plugins accessing the IR document in shared memory, or the generation of multiple IR documents using the plugins.

The Examiner's Answer states that Kuo discloses plugins processing IR documents, plugins accessing IR documents in shared memory, and a plurality of plugins generating multiple processed IR documents. The Applicant respectfully submits that each one of these assertions is incorrect. More explicitly, the Answer states that Kuo discloses an IR document in Fig. 4. Fig. 4 depicts an application program 371, an application program interface 372, a toolbox 373, drivers 374, a hardware abstraction layer 375, kernel 376, and system configuration 377. Fig. 4 does not depict an IR document, or an IR document stored in a shared memory.

The Answer states that Kuo's Fig. 6 depicts a plurality of plugins accessing the IR document in shared memory, citing col. 9, ln. 29-32. In traverse it is noted that the cite and figure describe the serial processing of data, as the output of a serially-connected plugin feeds the

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input of the next plugin. That is, each plugin does not access data from a common source (shared memory). Further, the data is not an IR document, Kuo discloses CCD data. CCD data is raw (native format) data and varies according the camera and manufacturer. CCD data is not organized as a standardized language. In particular, CCD data is not a print job language or an IR document. The advantage of using an IR document (the claimed invention) is that its standardized format permits it to be operated on by each plugin in parallel, without serial pre-processing by other plugins. Finally, Kuo describes no shared memory or access to a shared memory.

The Answer states that Kuo discloses generating multiple processed IR documents using the plurality of plugins, citing col. 8, ln. 60-66. In fact, Kuo discloses serial processing, where a single data file is processed in sequence by 3 plugins. Kuo does not disclose the creation of a plurality of processed CCD files.

The Office Action states that Kuo and Kawamoto are combinable because they both coordinate the functioning and communication of various image processing stages and handle the data flow between various stages, and that it would have been obvious for a practitioner to use a plurality of plugins to process data.

Even though Kuo discloses a plurality of plugins, he fails to make obvious several key limitations from the claimed invention. Therefore, even if a practitioner would have been motivated to combine a system for processing CCD data with Kawamoto, that combination fails to explicitly disclose or suggest the parallel processing of an IR document

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stored in shared memory. These specific limitations are not suggested by a general motivation save money or to integrate different platforms.

Respectfully submitted,

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